

TESTIMONY OF CHARLOTTE STRIEBEL
DTE 03-100

As Vice Chairman of the Cape Light Compact and Deputy Speaker of the Barnstable County Assembly of Delegates, I am here this afternoon to speak against DTE-03-100, the NSTAR Green Proposal.

The Cape Light Compact is a governmental aggregator under Massachusetts General Law, Chapter 164, Section 134 consisting of the twenty-one towns in Barnstable and Dukes Counties, and the two counties themselves. The Compact is organized through a formal Inter-Governmental Agreement signed by all of the towns and two counties. The Compact's Aggregation Plan was approved by the DTE.

As described in the Compact's Intergovernmental Agreement, one of the purposes of the Compact include, among many other things: the advancement of the interests of consumers in a competitive electric supply market and the encouragement of "renewable energy development to the extent practicable through contract provisions, demonstration projects and state mandated system benefit charges for renewable energy." The Compact is presently serving over 50,000 customers under a competitive power supply contract, and is working towards securing a power supply contract for the remaining 150,000 customers. The Compact also successfully operates a DTE approved Energy Efficiency Program within the Compact service territory.

As described in the Compact's Petition to Intervene, the Compact believes that the NSTAR Green Proposal would not enhance competitive markets and the development of renewable resources, but would stifle them. With this in mind, I would like to raise

the following points in support of the Compact's objection to the NSTAR Green Proposal:

1. Unlike the Massachusetts Electric Company's GreenUp Service filed in DTE 03-55, the NSTAR Green program **does not** offer customers a choice of competitive suppliers for their renewable energy supply. As a result of the lack of choice, the NSTAR Green program **does not** pass the DTE test regarding renewable [note to Maggie and Charlotte (not for testimony) remember this isn't even power though NSTAR implies it is] supply options offered by distribution companies. NSTAR Green does not "clearly demonstrate that providing such product is compatible with the development of competitive options for the customer classes to which the product would be available."
2. Unlike the Massachusetts Electric Company's GreenUp Service filed in DTE 03-55, the NSTAR Green program **does not** offer customers a choice in the level of renewable energy desired. As a result, the NSTAR Green program **fails to** eliminate barriers faced by competitive suppliers in the market. One could argue that the NSTAR Green program in fact introduces new barriers to market competition.
3. Unlike the Massachusetts Electric Company's GreenUp Service filed in DTE 03-55, the NSTAR Green program **does not** specify the mix of renewable energy sources to be utilized.
4. NSTAR claims that their Green program "offers a simple option for customers." Regardless of whether this is true, the point is that providing a simple option **does**

not address the threshold test that the DTE has established for distribution companies to offer renewable supply options.

5. Unlike the Massachusetts Electric Company's GreenUp Service filed in DTE 03-55, the NSTAR Green **program does not facilitate** competitive supply options for customers, **but is in fact the sole supplier.** This is contrary to the objectives of the Restructuring Act.
6. The NSTAR Green program is unclear as to how costs will be recovered from customers, both administrative costs as well as the cost for REC's. NSTAR states that all costs associated with NSTAR Green will be included in the participating customers bills; however, if the program is not successful and has limited participants, it is unclear as to who will pay for the costs associated with this program. Ratepayers should not be held responsible for any costs associated with this program. This is a shareholder responsibility.
7. The NSTAR Green program would be offered to residential, small commercial and small industrial customers who take generation service through NSTAR's standard offer or default service. There is no mention in the filing that this program could not be offered to the tens of thousands of former default service customers on Cape Cod or Martha's Vineyard since these customers take generation service through the Cape Light Compact's default pilot program.

As a result of the points I just addressed, the Compact intends to participate vigorously in this docket and respectfully requests that the DTE reject the NSTAR Green Proposal to move forward as submitted. The Compact further requests that the DTE

require NSTAR to design and model its program after the Massachusetts Electric Company's Green-Up Service filed in DTE 03-55 and offer competitive renewable providers a chance to participate on an equal footing.

Thank you for the opportunity to speak before you this afternoon on this very important subject.